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February 2, 2016

U.S. District Judge Kiyo Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Securities and Exchange Commission v. Martin Shkreli, et al., 15 CV 7175 (KAM)

Dear Judge Matsumoto:

On behalf of my client, Evan Greebel, I write to request an extension of time for Mr. Greebel's response to the government's Application to Intervene and to Stay Civil Proceedings (ECF No. 12). That Application was filed on January 25, 2016.

The Court's January 26, 2016 Order established February 4, 2016 as the date for defendants to respond to the government's motion. I request that the defendants' time to respond be adjourned one week to February 11, 2016, with the government's time to reply extended accordingly to February 18, 2016. I seek this extension in order more carefully to consider the applicable case law, confer with my client and prepare a response to the Application. This is Mr. Greebel's first request for an extension of time, and the first request by any party in this matter.

We have conferred with counsel for the other parties in this action. Newly retained counsel for Mr. Shkreli has indicated that they join in our request for additional time to respond. Mr. Gizzi, counsel for the SEC, informed us that the SEC also does not oppose this request. Assistant United States Attorney Alixandra Smith has advised us that the government takes no position on this request.

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We appreciate your consideration of Mr. Greebel's request for an extension.

Respectfully submitted,



Jonathan S. Sack

cc: AUSA Winston Paes, AUSA Alixandra Smith (via ECF)
Mr. Benjamin Brafman, counsel for Martin Shkreli (via ECF)
Mr. Paul Gizzi, Mr. Eric Schmidt, counsel for the Securities and Exchange Commission
(via ECF)